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heirs at law have agreed in writing to the requested substitution, as shown on the Family Settlement Agreement attached hereto as Exhibit C and incorporated by reference.

Pursuant to Rule 25a of the Federal Rules of Civil Procedure, it is hereby requested that “Shaun Helton, Personal Representative of the Estate of Beulah Mae Slatten, Deceased” be substituted in place of Plaintiff Beulah Mae Slatten in this action, so that Decedent’s claims survive, and the action on her behalf may proceed.

The request under this Motion is not sought for delay, but so that justice may be done.

Respectfully submitted,

/s/ Howard L. Nations

Howard L. Nations

Texas Bar No. 14823000

3131 Briarpark Drive, Suite 208

Houston, TX 77042

(713) 807-8400

(713) 807-8423 (Telecopier)

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that I have attempted to contact Counsel for Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc., and while my attempt was acknowledged, Counsel has not expressed their position regarding this motion.

/s/ Howard L. Nations

Howard L. Nations

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of June, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Howard L. Nations

Howard L. Nations